

## SKADDEN, ARPS, SLATE, MEAGHER &amp; FLOM LLP

FOUR TIMES SQUARE

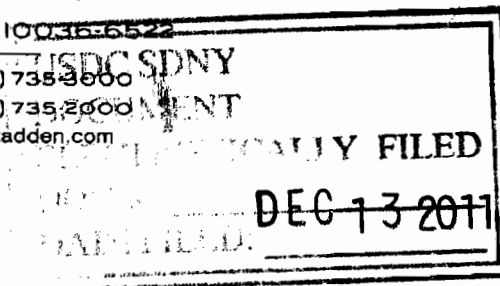
NEW YORK 10036-6522

TEL: (212) 735-3000

FAX: (212) 735-2000

www.skadden.com

DIRECT DIAL  
212-735-7852  
DIRECT FAX  
917-777-7852  
EMAIL ADDRESS  
SCOTT.MUSOFF@SKADDEN.COM



W/AFFILIATE OFFICES

BOSTON  
CHICAGO  
HOUSTON  
LOS ANGELES  
PALO ALTO  
WASHINGTON, D.C.  
WILMINGTON  
BEIJING  
BRUSSELS  
FRANKFURT  
HONG KONG  
LONDON  
MOSCOW  
MUNICH  
PARIS  
SAO PAULO  
SHANGHAI  
SINGAPORE  
SYDNEY  
TOKYO  
TORONTO  
VIENNA

November 15, 2011

**BY HAND**

Honorable George B. Daniels  
United States District Judge  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**SO ORDERED**  
The oral argument is scheduled for  
May 10, 2012 at 10:00 a.m.  
DEC 12 2011  
*George B. Daniels*  
HON. GEORGE B. DANIELS

RE: *Tomlinson v. Travelzoo Inc., et al.*, 11-cv-05531 (GBD)  
*Steamfitters v. Travelzoo Inc., et al.*, 11-cv-06845 (GBD)  
*Wang v. Bartel, et al.*, 11-cv-06125 (GBD)  
*Wirth v. Bartel, et al.*, 11-cv-06378 (GBD)  
*Kitt v. Bartel, et al.*, 11-cv-07019 (GBD)  
*Turansky v. Bartel, et al.*, 11-cv-07389 (GBD)

Dear Judge Daniels:

Pursuant to the Court's direction at the November 8, 2011 conference, we write on behalf of all parties in the above-referenced matters<sup>1</sup> to respectfully submit proposed orders of consolidation for the Securities Action and the Derivative Action as well as a proposed briefing schedule for defendants'

<sup>1</sup> We represent all defendants in the putative class actions, *Tomlinson v. Travelzoo Inc., et al.*, 11-cv-05531 (GBD), and *Steamfitters v. Travelzoo Inc., et al.*, 11-cv-06845 (GBD) (collectively, the "Securities Action"), and defendants Ralph Bartel, Holger Bartel, Christopher Loughlin, Wayne Lee and Nominal Defendant Travelzoo Inc. in the derivative actions, *Wang v. Bartel, et al.*, 11-cv-06125 (GBD), *Wirth v. Bartel, et al.*, 11-cv-06378 (GBD), *Kitt v. Bartel, et al.*, 11-cv-07019 (GBD) and *Turansky v. Bartel, et al.*, 11-cv-07389 (GBD) (collectively, the "Derivative Action").

Judge George B. Daniels  
November 15, 2011  
Page 2

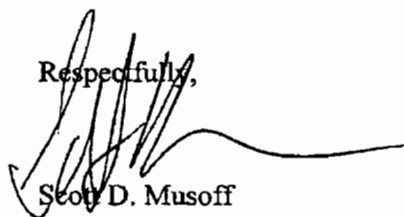
anticipated motions to dismiss or other response to the consolidated amended complaints.

The parties respectfully propose the following briefing schedule, which in light of plaintiffs' request for sixty days to file consolidated amended complaints in the Securities Action and the Derivative Action so that they can complete their investigation, goes beyond the April 3, 2012 oral argument date tentatively scheduled by the Court. Plaintiffs request 60 days within which to file their complaints because they believe it is necessary for a thorough investigation.

1. Lead Plaintiff in the Securities Action and Lead Counsel in the Derivative Action shall have until and including January 6, 2012 to file and serve consolidated amended complaints;
2. Defendants shall answer, move or otherwise respond with respect to the consolidated amended complaints by March 5, 2012;
3. Lead Plaintiff in the Securities Action and Lead Counsel in the Derivative Action shall file and serve oppositions to Defendants' motions by April 4, 2012; and
4. Defendants shall file and serve any reply papers by April 26, 2012.

The parties remain available at the Court's convenience.

Respectfully,



Scott D. Musoff

cc: Adam S. Hakki, Esq.  
Joseph R. Seidman, Jr., Esq.  
Daniella Quitt, Esq.  
Robert B. Weiser, Esq.